IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)Chapter 13
	)
JOSEPH DOLINAR, III	)Case No.: 18-24648 CMB
	)
Debtor(s)	)
	)Doc No:82
BAYVIEW LOAN SERVICING LLC	)
	)
Movant	)
	)
vs	)
	)
JOSEPH DOLINAR, III	)
	)
Respondents	)
	)
And	)
	)
RONDA J. WINNECOUR ESQUIRE	)
CHAPTER 13 TRUSTEE	)
	)
Additional Respondent	)

CERTIFICATION IN RESPONSE TO MOTION FOR RELIEF FROM STAY FILED BY BAYVIEW LOAN SERVICING LLC

Sean Logue, Esquire of full age, hereby certifies and says:

1. I am counsel for the above debtor, Joseph Dolinar, III

2. The debtors Chapter 13 Case was filed on November 30, 2018.

3. Listed in the debtors Chapter 13 schedules and plan is the debtors residential

property located at 102 Stuart Street, Bethel Park, PA 15102 which property is

subject to a first mortgage lien held by Bayview Loan Servicing, LLC.

4. On September 16, 2020 Bayview Loan Servicing filed a Motion for Relief from

Stay stating the debtor was behind with his plan payments which payments

included his post-petition mortgage payments.

5. The debtors Chapter 13 plan proposes to sale the Debtors rental property to

satisfy all debt owed by the debtor including any mortgage arrearages owed to

Bayview Loan Servicing, LLC.

6.The debtor has just notified Counsel that they have a contract for sale and that

there will be closing on the rental property prior to the end of the year.

7.The debtor has been delayed in making plan payments due to a Cancer

diagnosis and his inability to maintain work due to poor health. The feasibility of

the plan relies on the sale of the rental property which property now has a valid

Contract for sale. A Motion to sale said Property will be filed with the court in the

coming weeks.

8. For the reasons stated above the debtor, through Counsel would request that the

Motion for Relief from Stay filed by Bayview Loan Servicing, LLC be denied and

the debtor be allowed to cure all mortgage arrears and deficient plan payments

with the proceeds of the pending Rental property sale.

EXECUTED ON October 2, 2020   By /s/ Sean Logue
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